



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

11 JAN 2017

**CERCLA 104(e) INFORMATION REQUEST**  
**URGENT LEGAL MATTER: PROMPT REPLY REQUESTED**  
**VIA CERTIFIED MAIL #7015 1520 0003 3990 1082**

Ergon, Inc.  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;  
CERCLIS #: LAD008434185; Information Request Pursuant to  
CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) is investigating the releases and/or threatened releases of hazardous substances, pollutants, or contaminants at the SBA Shipyard Superfund Site (Site) located in Jennings, Jefferson Davis Parish, Louisiana. This letter seeks your cooperation in providing information and documents relating to the contamination of the Site. A Superfund site is a site contaminated with levels of hazardous substances that may present a threat to human health and the environment.

The EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and disposal methods of hazardous substances, pollutants, or contaminants that have been or threaten to be released from the Site. The EPA has information that you may have had business transactions with the owners and operators of the Site or you may have information about the past operations and conditions of the Site.

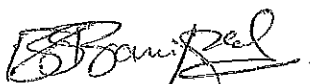
**This information request is not a determination that you are responsible or potentially responsible for contamination that occurred at the Site.** The EPA is sending you this letter as part of its investigation of the circumstances related to the Site and does not expect you to pay for or perform any site-related activities at this time. Should EPA determine that you are responsible or potentially responsible for response activity at the Site, you will receive a separate letter clearly stating such a determination as well as the basis EPA has for making such a determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to request this information (see Enclosure 1). We encourage you to give this matter your full attention, and ***we request that you respond to this request for information within thirty (30) calendar days of your receipt of this letter.*** You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$53,907.00 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Kenneth Talton, Enforcement Officer, at the address included in the Information Request. Please refer to the enclosures below, which include important instructions and definitions, as well as the questions for response, in the preparation of your reply to this Information Request.

If you have any questions regarding this letter, contact Mr. Kenneth Talton at (214) 665-7475. For legal questions concerning this letter, please have your legal counsel contact Ms. I-Jung Chiang, at (214) 665-2160. Thank you for your attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Ben Banipal", with a stylized flourish at the end.

Ben Banipal, P.E., Branch Chief  
Technical and Enforcement Branch  
Superfund Division

Enclosures

## ENCLOSURE 1

### SBA SHIPYARD SUPERFUND SITE JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA INFORMATION REQUEST

#### RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA Section 104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Site's history or this information request letter, please contact Mr. Kenneth Talton, the designated Enforcement Officer for the Site, at phone number (214) 665-7475, fax number (214) 665-6660 or via email at [talton.chuck@epa.gov](mailto:talton.chuck@epa.gov). Please mail your response within 30 calendar days of your receipt of this request to the following address:

Mr. Kenneth Talton, Enforcement Officer  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

If you or your attorney have legal questions that pertain to this information request letter, please contact Ms. I-Jung Chiang at phone number (214) 665-2160, fax number (214) 665-6460 or via email at [Chiang.I-Jung@epa.gov](mailto:Chiang.I-Jung@epa.gov). For contact via mail, use the following address:

Ms. I-Jung Chiang, Attorney  
Office of Regional Counsel (6RC-S)  
U.S. EPA Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

#### BACKGROUND INFORMATION

The Site is situated on approximately 98 acres of land located in a rural-industrial area at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana 70546. The Site is within Section 19 of Range 2W, Township 10S and is located at the end of Louisiana Highway 3166) which is on the west bank of the Mermentau River. The Site is approximately four miles southeast of downtown Jennings and two miles southwest of the village of Mermentau. The Site is bordered to the north by residents, south and west by wetlands, and east by the Mermentau River and wetlands.

The Site primarily consists of two separately-owned parcels of property, one southern and one northern. The southern and northern properties are generally divided by a property line that runs just north of the large barge slip. Suzanne Smailhall Cornelius, (heir of Louis Smailhall, principal of SBA Shipyards, Inc.) and SBA Shipyards, Inc. (now inactive) own the southern property, which historically was operated as a barge cleaning operation. Bunge Street Properties, LLC, f/k/a Leevac Shipyards, Inc., owns the northern property, which historically was operated as a vessel construction and repair operation.

SBA Shipyards, Inc. ("SBA") began operations at the Site on about 1965. Initially, it performed vessel construction and repair operations on what is now the northern parcel. In the 1970s, SBA constructed the graving dock on the northern parcel and dredged the barge slip and constructed the barge cleaning facility on what is now the southern parcel. Leevac Shipyards, Inc. ("Leevac") entered into a lease with option to purchase for the northern vessel construction and repair facility with SBA in 1993. Leevac operated vessel construction and repair operations on the northern parcel beginning in 1993. Leevac then exercised its option to purchase in 1998 and acquired the northern parcel at that time and continued its operations. SBA continued to operate its barge cleaning operations on the southern parcel up until approximately 2006, when Mr. Smailhall died.

Vessel construction and repair utilized two launch slips with on-land rails to haul and launch vessels and eventually a graving dock with a moving gate where a vessel could enter and the dock de-watered to allow construction and repairs on dry land. Both SBA and Leevac activities included sandblasting, cutting and painting, as well as fabricating and repairing vessels. Barge cleaning operations were conducted by SBA only on the southern parcel. SBA converted a small barge placed on land adjacent to the barge slip into its "boiler barge," which it used to generate steam for use in cleaning barges and it also served as the barge cleaning control room.

SBA cleaned barges and other vessels that had contained as last cargoes a variety of materials, including, but not limited to: acrylates, asphalt, carbon tetrachloride, coal tar, coke oven tar, carbon black, carbon oil, caustic soda, creosote, cumene, black oil and black oil slop, bunker crude, diesel fuel, heavy grease, waste water, ethyl acrylates, kerosene, lube oil, methanol, number 6 oil, rust, scale, styrene, sour gas oil, soy bean oil, sulphuric acid, tallow, and vinyl acetate.

SBA used a large partially buried barge, as well as above-grade tanks constructed from cut-up barges, to store liquids, sludges, solids and other materials during the barge cleaning process. SBA also constructed and used an unlined surface impoundment called the Oil Pit to store liquids, sludges, solids and other materials. Aside from the Oil Pit, SBA used three other unlined surface impoundments, called Water Pits 1, 2 and 3, to receive wastewater, sludges, and solids from the barge cleaning process.

Records reviews indicate that SBA unsuccessfully undertook efforts to bio-remediate Water Pit 1 during 1990 and 1991. SBA proposed to implement a RCRA Facility Investigation (RFI) and submitted an RCRA RFI Work Plan in 1996, that proposed the complete closure of the impoundments and tanks. EPA issued a RCRA 3008(a) Compliance Order to SBA on July 1, 1997. On September 9, 1997 SBA entered into a Consent Agreement and Final Order (CAFO) with EPA to resolve all issues presented in the Compliance Order regarding storage, disposal and treatment of hazardous waste without a permit, and clean-up the facility. However, SBA was unable to implement any of the actions required under the CAFO.

Thereafter, in December 10, 2002 EPA entered into an Order and Agreement for Interim Measures/Removal Action (IM/RA) of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc., Docket No. RCRA-6-2002-0908, pursuant to RCRA Section 3008(h) ("2002 Order/Agreement") with SBA and SSIC Remediation, LLC ("SSIC"), an entity formed by certain former customers of SBA's barge cleaning operations to conduct this work. Interim removal activities were conducted from March 2001 through January 2005 under the 2002 Order/Agreement. Interim removal activities consisted of the removing, solidifying, and recycling and/or disposing off-site the waste in the Oil Pit and Water Pit 2 and then over-excavation of the Oil Pit and Water Pit 2; removal and scrapping of above ground storage tanks; draining and refilling of Water Pit 3; removing all pumpable materials from the partially buried barge and disposing those materials off-site, then welding shut all hatches to that barge; and surface scrapping of all visible materials from a former land treatment unit. By letter dated February 24, 2006, EPA Region 6's RCRA branch reviewed and approved the completion report of the IM/RA activities and concluded that the completion report fulfilled the 2002 Order/Agreement. The IM/RA, however, was intended as an interim response; hazardous substance remained onsite after the IM/RA.

In October 2012, the U.S. Coast Guard and the LDEQ responded to a reported release at the barge cleaning portion of the Site from an attempt to scrap the "boiler barge" and the partially buried storage barge by parties contracted by the owner of the southern portion of the Site.

During 2014 to 2015, EPA conducted a CERCLA emergency removal action and an Oil Pollution Act of 1990 (OPA) removal action after LDEQ reported barge scrapping activities and releases of visible liquids at the Site.

Between December 2012 and September 2014, EPA conducted a preliminary assessment, site inspection and expanded site inspection. As part of the EPA activities, the Agency conducted sampling activities at the Site. During those site activities, EPA sampling documented releases or threats of releases of hazardous substances in the subsurface and groundwater of the Site, the Mermentau River, and wetlands surrounding the Site. Numerous hazardous substances were identified at the Site including petroleum hydrocarbons, numerous polycyclic aromatic hydrocarbons ("PAHs"), dioxins/furans, metals, and volatile organic compounds ("VOCs"). Petroleum and non-petroleum substances found at portions of the Site are or were comingled.

Specific PAHs founds at the Site include: acenaphthene; anthracene; acenaphthylene; benzo(a)anthracene; benzo(a)pyrene; benzo(b)fluoranthene; benzo(g,h,i)perylene; benzo(k)fluoranthene; 1,1'-biphenyl; carbazole; chrysene; dibenzofuran; dibenz(a,h)anthracene; fluoranthene; fluorine; indeno(1,2,3-cd)pyrene; 2-methylnaphthalene; naphthalene; phenanthrene; and pyrene.

Specific dioxins/furans found at the Site include: Chlorinated Dibenzo-p-Dioxins and Chlorinated Dibenzofurans. Those with some of the highest TEQs include: 2,3,4,7,8-Pentachlorodibenzofuran; 2,3,4,6,7,8-Hexachlorodibenzofuran ("HxCDF"); 1,2,3,6,7,8-HxCDF; 1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin; and Octachlorodibenzo-p-dioxin.

Specific metals found at the Site include: arsenic; chromium; cobalt; lead; mercury; manganese; cadmium; copper; nickel; zinc; and barium.

Specific VOCs and Semi VOCs found at the Site include: benzene; cyclohexane; methylcyclohexane; 1,2-dichlorobenzene; ethylbenzene; tetrachloroethene; styrene; isopropylbenzene; tetrachloroethene; xylene; cis-1,2-dichloroethane; toluene; and vinyl chloride.

Local residents reportedly use the Mermentau River for recreational fishing. During the ESI, EPA observed a family of five fishing in the Site's barge slip. HRS documentation of EPA's findings identifies a human food fishery in the Mermentau River, both within and outside the zone of contamination; and Lake Arthur at the terminus of the 15-mile target distance limit.

EPA's findings identify the predominant threat to human populations, animals, or the food chain is the potential for exposure by direct contact with PAHs, VOCs, dioxins/furans, and metals.

Pursuant to CERCLA Section 105, 42 U.S.C. § 9605, the SBA Shipyard site was listed on the National Priorities List (81 FR 62397) on September 9, 2016.

On November 18, 2016, EPA entered into an Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study ("ASAOC") with some of the potentially responsible parties.

## ENCLOSURE 2

### SBA SHIPYARD SUPERFUND SITE JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA INFORMATION REQUEST

#### INSTRUCTIONS AND DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

## **DEFINITIONS**

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
5. The term "hazardous material" shall mean any hazardous substances, pollutants or contaminants, and hazardous wastes, as defined below.
6. The term "hazardous substance" shall have the same definition as that contained in Subsection 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances.
7. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and 40 CFR Part 261.



8. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business. Also provide e-mail addresses.
9. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation [including state of incorporation], partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses.
10. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
11. The term "material(s)" shall mean any and all objects, goods, substances, or matter of any kind including, but not limited to, wastes or hazardous wastes.
12. The term "operator" shall mean those persons who operates or operated the facility (i.e., the SBA Shipyard Superfund Site) during the time when the hazardous substances were disposed.
13. The term "owner" shall mean those persons who now own or owned the facility (i.e., the SBA Shipyard Superfund Site).
14. The term "person" shall have the same definition as in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
15. The terms "pollutant" or "contaminant," shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants and contaminants with any other substances. The term shall include, but not be limited to, any element, substance, compound, or mixture. The term shall also include disease-causing agents which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunction in reproduction), or physical deformations.
16. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

17. The term "Site" or "Facility" shall mean and include the SBA Shipyard Superfund Site located on the west bank of the Mermentau River at the end of Louisiana Highway 3166 approximately four miles southeast of Jennings, Louisiana and approximately two miles southwest of the Mermentau River. SBA is situated on approximately 98 acres of land located in a rural-industrial area, at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana. The facility is within Section 19 of Range 2W, Township 10S.
18. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA, 42 U.S.C. § 6903(27), and 40 CFR Part 261.
19. The term "you" or "your" or "Respondent" or "you" shall mean the addressee of this Request, including the addressee's officers, managers, employees, contractors, tastes, partner, successors and agents.
20. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
21. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.
22. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

**ENCLOSURE 3**  
**SBA SHIPYARD SUPERFUND SITE**  
**JENNINGS, JEFFERSON PARISH, LOUISIANA**

**INFORMATION REQUEST**

**QUESTIONS**

**GENERAL INFORMATION CONCERNING RESPONDENT**

1. Provide the full legal name and mailing address of the Respondent.
2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.
4. If Respondent is a business, please give a brief description of the nature of the business.

**REQUESTS FOR DOCUMENTS**

Please identify (see Definitions) and provide copies of all documents (see Definitions) consulted, examined, or referred to in the preparation of the answers to the above questions including all subparts of each question, or that contain information responsive to the question.

**Section 1**

1. Have you or any associated and/or related entities in any way been involved with or conducted business with the Site?
  - a. If so, please describe your involvement with the Site.
  - b. Provide copies of documents related to any involvement with the Site.
2. If your answer to question 1 above is "No", **you do not need to respond to the remaining questions.**

**Section 2**

3. Please identify any dealings or transactions you and/or any associated entities have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.

- a. Specifically, provide date(s) that your barge(s) were sent to and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements.
4. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 3 above.
5. Please include a detailed listing of cargo materials from transactions described in Question 3 the materials data safety sheet, dates of transaction, and any quantity associated with those materials.
6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:
  - a. Each individual's job title and duties (including the dates performing those duties),
  - b. The supervisors for such duties,
  - c. The current position or the date of the individual's resignation,
  - d. The nature of the information possessed by such individuals concerning the Respondent's waste management, and
  - e. The contact information of the individual.
7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).
8. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.
9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s).
10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).
11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.
12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

13. If barges were placed or disposed at the Site, provide the following information:
  - a. Where they were placed or disposed, and
  - b. Their condition when placed or disposed.
14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

**ENCLOSURE 4**  
**PARTIES RECEIVING EPA'S MAY 15, 2015, INFORMATION REQUESTS**  
**SBA SHIPYARDS SUPERFUND SITE**  
**JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA**

Allied Towing  
c/o Allied Towing Service LLC  
Francis J. Lobrano  
Registered Agent for Allied Towing Service LLC  
147 Keating Dr.  
Belle Chasse, Louisiana 70037

Allied Towing  
c/o Allied Towing Service LLC  
12608 Hwy 23  
Belle Chase, Louisiana 70037

Ashland Petroleum Company  
Ashland Oil Company  
c/o Ashland Inc.  
Stephen L. Spalding  
Registered Agent for Ashland Inc.  
3475 Blazer Pkwy.  
Lexington, Kentucky 40509

Ashland Petroleum Company  
Ashland Oil Company  
c/o Ashland Inc.  
Attn: Legal Department  
50 East Rivercenter Blvd.  
Covington, Kentucky 41012

Koppers Company Inc.  
c/o Beazer East Inc.  
Jill M. Blundon  
Registered Agent for Beazer East Inc.  
436 Seventh Ave.  
Pittsburgh, Pennsylvania 15219

Koppers Company Inc.  
c/o Beazer East Inc.  
99 Wood Ave. South  
Iselin, New Jersey 08830

Koppers Company Inc.  
c/o Beazer East, Inc.  
1910 Cochran Rd., Suite 200  
Pittsburgh, Pennsylvania 15220

Cenac Towing Co.  
c/o Cenac Towing Co. LLC  
Arlen B. Cenac Jr.  
Registered Agent for Cenac Towing Co. LLC  
742 Highway 182  
Houma, Louisiana 70364

Conoco Inc.  
c/o ConocoPhillips Company  
United States Corporation Co.  
Registered Agent for ConocoPhillips Company  
320 Somerulos St.  
Baton Rouge, Louisiana 70802-6129

Conoco Inc.  
c/o ConocoPhillips Company  
Attn: Legal Department  
600 N. Dairy Ashford Rd.  
Houston, Texas 77079

Continental Oil Company  
Corporation Service Co.  
Registered Agent for Continental Oil Company  
320 Somerulos St.  
Baton Rouge, Louisiana 70802-6129

Continental Oil Company  
Attn: Legal Department  
600 N. Dairy Ashford Rd.  
Houston, Texas 77079

Higman Marine Service  
c/o Higman Services Corporation  
CT Corporation System  
Registered Agent for Higman Services Corporation  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Higman Marine Service  
c/o Higman Services Corporation  
Attn: Legal Department  
1980 Post Oak Blvd., Suite 1101  
Houston, Texas 77056

Ingram Barge Co.  
CT Corporation System  
Registered Agent for Ingram Barge Co.  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Ingram Barge Co.  
4400 Harding Road  
Nashville, Tennessee 37205

Barge Transport Co.  
c/o Jean D Towing Co.  
Francis Emmett  
Registered Agent for Jean D Towing Co.  
1340 Poydras Street, #2010  
New Orleans, Louisiana 70112

Barge Transport Co.  
c/o Jean D Towing Co.  
Attn: Legal Department  
1818 McKinney Ave.  
Houston, Texas 77003

Hall-Buck Marine  
c/o Kinder Morgan Bulk Terminals Inc.  
CT Corporation System  
Registered Agent for Kinder Morgan Bulk Terminals Inc.  
5615 Corporate Blvd., Suite 40B  
Baton Rouge, Louisiana 70808

Hall-Buck Marine  
c/o Kinder Morgan Bulk Terminals Inc.  
Attn: Legal Department  
7116 Hwy 22  
Sorrento, Louisiana 70778

Hollywood Marine Inc.  
c/o Kirby Inland Marine LP  
Corporation Service Co.  
Registered Agent for Kirby Inland Marine LP  
320 Somerulos St.  
Baton Rouge, Louisiana 70802-6129

Hollywood Marine Inc.  
c/o Kirby Inland Marine LP  
Attn: Legal Department  
55 Waugh Dr., Suite 1000  
Houston, Texas 77007

Marine Operators  
c/o Marine Operators, Inc.  
Joseph C. Giglio Jr.  
Registered Agent for Marine Operators, Inc.  
822 Harding St.  
Lafayette, Louisiana 70503

Marine Operators  
c/o Marine Operators Inc.  
Attn: Legal Department  
1030 East St. Mary Blvd. Bldg #3, Suite 14  
Lafayette, Louisiana 70505

Marine Vacuum  
c/o Marine Vacuum Inc.  
Charles C. Culotta Jr.  
Registered Agent for Marine Vacuum Inc.,  
1207 Main St.  
Patterson, Louisiana 70392

Marine Vacuum  
c/o Marine Vacuum, Inc.  
Attn: Legal Department  
1902 Hwy 90 West  
Patterson, Louisiana 70392

Union Mechling  
Dravo Mechling  
National Marine Inc.  
c/o Seacor Marine, LLC  
CT Corporation System  
Registered Agent for Seacor Marine, LLC  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Union Mechling  
Dravo Mechling  
National Marine Inc.  
c/o Secor Marine, LLC  
Attn: Legal Department  
7910 Main St., 2nd Floor  
Houma, Louisiana 70360

Petroleum Inc.  
c/o Petroleum, Inc.  
CT Corporation System  
Registered Agent for Petroleum, Inc.,  
5615 Corporate Blvd. Suite 400B  
Baton Rouge, Louisiana 70808

Petroleum Inc.  
c/o Petroleum, Inc.  
Attn: Legal Department  
300 W. Douglas, Suite 1050  
Wichita, Kansas 67202-2913

Sabine Towing  
c/o Sabine Towing & Transportation Co. Inc.  
CT Corporation System  
Registered Agent for Sabine Towing & Transportation Co. Inc.  
5615 Corporate Blvd. Suite 400B  
Baton Rouge, Louisiana 70808

Sabine Towing & Transportation Co. Inc.  
c/o Sequa Corporation  
Attn: Legal Department  
300 Blaisdell Rd.  
Orangeburg, New York 10962

Shell Oil  
c/o Shell Oil Company  
CT Corporation System  
Registered Agent for Shell Oil Company  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Shell Oil  
c/o Shell Oil Company  
Attn: Legal Department  
910 Louisiana St.  
Houston, Texas 77002

Sooner Refining Co.  
c/o Sooner Refining Co., Inc.  
Charles N. Wooten  
Registered Agent for Sooner Refining Co., Inc.  
Ridge Rd, P. O Box 3325  
Lafayette, Louisiana 70502

Stewart Transportation  
c/o Stewart Transport LLC  
Kenneth Michael Stewart  
Registered Agent for Stewart Transport LLC  
813 Brushwood Drive  
Dubberly, Louisiana 71024

Sun Oil  
c/o Sun Oil Company  
Corporation Service Co.  
Registered Agent for Sun Oil Company  
320 Somerulos St.  
Baton Rouge, Louisiana 70802-6129

Sun Oil  
c/o Sun Oil Company  
Attn: Legal Department  
1818 Market St., Suite 1500  
Philadelphia, Pennsylvania 19103

Sun Terminals of Louisiana  
c/o Sun Terminals Inc. of Louisiana  
Registered Agent for Sun Terminals, Inc. of Louisiana  
907 South Detroit St.  
Tulsa, Oklahoma 74102

Sun Terminals of Louisiana  
c/o Sun Terminals, Inc. of Louisiana  
Attn: Legal Department  
Hwy 37  
Nederland, Texas 77627

Talen's Marine & Fuel  
c/o Talen's Marine & Fuel LLC  
CT Corporation System  
Registered Agent for Talen's Marine & Fuel LLC  
5615 Corporate Blvd., Suite 400 B  
Baton Rouge, Louisiana 70808

Talen's Marine & Fuel  
c/o Talen's Marine & Fuel LLC  
Attn: Legal Department  
1707 Evangeline Road  
Jennings, Louisiana 70546

Hess Oil Co.  
c/o WR Hess Co.  
CT Corporation System  
Registered Agent for WR Hess Co.  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Hess Oil Co.  
c/o WR Hess Co.  
Attn: Legal Department  
1108 South 4th Street  
Chickasha, Oklahoma 73018

Canal Barge Company, Inc.  
William Murphy  
Registered Agent for Canal Barge Company, Inc.  
835 Union St.  
New Orleans, Louisiana 70112

Canal Barge Company, Inc.  
1801 Engineers Road  
Belle Chasse, Louisiana 70037



L&L Oil Service  
c/o Martin Energy Services LLC  
CT Corporation System  
Registered Agent for Martin Energy Services LLC  
32 North Jackson St., Ste 605  
Montgomery, Alabama 36104

L&L Oil Service  
c/o Martin Energy Services LLC  
Three Riverway, Suite 400  
Houston, Texas 77056

Martin Energy Services LLC  
Two Lakeway Center  
3850 N. Causeway Blvd, Ste 1330  
Metairie, Louisiana 70002

Martin Gas M  
c/o Martin Operating Partnership L.P.  
The Corporation Trust Company  
Registered Agent for Martin Operating Partnership L.P.  
Corporation Trust Center  
1209 Orange St.  
Wilmington, Delaware 19801

Martin Gas M  
c/o Martin Operating Partnership L.P.  
4200 B Stone Road  
Kilgore, Texas 75662

LeeVac Petroleum  
c/o LeeVac Petroleum LLC  
Richard A. Aguilar  
Registered Agent for LeeVac Petroleum LLC  
643 Magazine St.  
New Orleans, Louisiana 70130

LeeVac Petroleum LLC  
27 N. Columbia St.  
Covington, Louisiana 70433

Sargent Marine  
c/o Sargeant Marine, Inc.  
Harry Sargeant, Jr.  
Registered Agent for Sargeant Marine, Inc.  
3020 N. Military Trail, #100  
Boca Raton, Florida 33431

**PARTIES RECEIVING EPA'S NOVEMBER 17, 2015, INFORMATION REQUESTS**  
**SBA SHIPYARDS SUPERFUND SITE**  
**JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA**

National Marine Service  
c/o American Commercial Barge Line Company  
Registered Agent for American Commercial Barge Line  
Company  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

National Marine Service  
c/o American Commercial Barge Line Company  
1701 East Market Street  
Jefferson, IN 47130

Hollywood Marine Inc.,  
c/o Kirby Inland Marine, LP  
Registered Agent for Corporation Service Company  
d/b/a CSC-Lawyers Incorporating Service Company  
211 E. 7th Street, Suite 620  
Austin, Texas 78701-3136

Hollywood Marine Inc.,  
c/o Kirby Inland Marine, LP  
55 Wargh Drive, Suite 1000  
Houston, Texas 77007

Transerve Marine, Inc.  
Registered Agent for Transerve Marine, Inc.  
Vb Business Services LLC  
500 World Trade Center  
Norfolk, Virginia 23510

Transerve Marine, Inc.  
500 E. Indian River Rd.  
Norfolk, Virginia 23523

Allied Towing Service, LLC  
Francis J. Lobrano  
Registered Agent for Allied Towing Service LLC  
147 Keating Dr.  
Belle Chasse, Louisiana 70037

Allied Towing Service LLC  
12608 Hwy 23  
Belle Chasse, Louisiana 70037

Steuart Transportation Company  
Registered Agent for Steuart Transportation Company  
National Registered Agents, Inc., of MD  
351 W Camden Street  
Baltimore, Maryland 21201

Steuart Transportation Company  
5454 Wisconsin Avenue, Suite 1600  
Chevy Chase, Maryland 20815

Marine Vacuum Service, Inc.  
Registered Agent:  
Harold A Thoreen  
Fishermen's Term Nordby Bldg.  
1715 W Nickerson Street  
Seattle, Washington 98119

Marine Vacuum Service, Inc.  
P.O. Box 24263  
Seattle, Washington 98124

Morania Oil Tanker Corp.  
c/o Penn Maritime Inc.  
Registered Agent for Penn Maritime Inc.  
Corporation Service Company  
50 Weston Street  
Hartford, Connecticut 06120-1537

Morania Oil Tanker Corp.  
c/o Penn Maritime Inc.  
55 Waugh Dr., Suite 1000  
Houston, Texas 77007

Sargeant Marine, Inc.  
Registered Agent:  
Harry Sargeant, Jr.  
3020 N Military Tr., #100  
Boca Raton, Florida 33431

Sargeant Marine, Inc.  
3020 N Military Tr., #100  
Boca Raton, Florida 33431

Cari Investments, LLC  
Registered Agent:  
Babuini Rina (p)  
8689 Boca Drive  
Unit 21

Boca Raton, Florida 33433  
Cari Investments, LLC  
8689 Boca Drive  
Unit 21  
Boca Raton, Florida 33433

**PARTIES RECEIVING JANUARY 11, 2017, INFORMATION REQUESTS**  
**SBA SHIPYARDS SUPERFUND SITE**  
**JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA**

American River Transportation Co., LLC  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr  
Baton Rouge, Louisiana 70816

American River Transportation Co., LLC  
Attn: Legal Department  
4666 Faries Parkway  
Decatur, Illinois 62525

Apex Oil Company  
C T Corporation System  
Registered Agent  
9 Capitol Street  
Concord, New Hampshire 03301

Apex Oil Company  
Attn: Legal Department  
1300 Hibernia Bldg.  
New Orleans, Louisiana 70112

Apex Oil Company  
Attn: Legal Department  
8235 Forsyth Blvd., Suite 400  
Saint Louis, Missouri 63105

Atlantic Richfield Company  
The Corporation Trust Company  
Registered Agent  
Corporation Trust Center  
1209 Orange St  
Wilmington, Delaware 19801

Atlantic Richfield Company  
Attn: Legal Department  
501 Westlake Park Blvd.  
Houston, Texas 77079

Arkema Inc.  
Lawyers Incorporating Service  
Registered Agent  
10 Ferry Street S313  
Concord, New Hampshire 03301

Arkema Inc.  
900 First Ave  
King of Prussia, Pennsylvania 19406

Blessey Marine Services, Inc.  
Patrick W. Voss  
Registered Agent  
1515 River Oaks Road East  
Harahan, Louisiana 70123

Blessey Marine Services, Inc.  
Attn: Legal Department  
1515 River Oaks Road East  
Harahan, Louisiana 70123

Buffalo Marine Services, Inc.  
Mark L. Webb  
Registered Agent  
700 Gardenia Ln  
Plantation, Florida 33317

Cargill, Incorporated  
Theodore M. Haik, III  
Registered Agent for Cargill, Incorporated  
C/O Haik, Minvielle & Grubbs, LLP  
1017 East Dale St  
New Iberia, Louisiana 70562

Cargill, Incorporated  
Attn: Legal Department  
9320 Excelsior Blvd  
Hopkins, Minnesota 55343

CF Industries Holdings, Inc.  
Registered Agent  
Corporation Service Company  
2711 Centerville Rd, Suite 400  
Wilmington, Delaware 19808

CF Industries Holdings, Inc.  
Attn: Legal Department  
4 Parkway North, Suite 400  
Deerfield, Illinois 60015

Coastal Barge & Mooring LLC  
John F. Loyd, Jr.  
167 Park Row  
Brunswick, Maine 04011

Cytec Industries Inc.  
Corporation Service Company  
Registered Agent  
2711 Centerville Rd, Suite 400  
Wilmington, Delaware 19808

Cytec Industries Inc.  
Attn: Legal Department  
5 Garret Mountain Plaza  
Woodland Park, New Jersey 07424

Dow Chemical Company  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Dow Chemical Company  
Attn: Legal Department  
2030 Dow Center  
Midland, Michigan 48674

E I du Pont De Nemours and Company  
The Corporation Trust Company  
Registered Agent  
Corporation Trust Center  
1209 Orange St  
Wilmington, Delaware 19801

E I du Pont De Nemours and Company  
Attn: Legal Department  
1007 Market Street  
Wilmington, Delaware 19898

Ergon, Inc.  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr  
Baton Rouge, Louisiana 70816

Ergon, Inc.  
Attn: Legal Department  
2829 Lakeland Dr.  
Jackson, Mississippi 39232

Florida Marine Transporters, LLC  
National Registered Agents, Inc.  
Registered Agent  
160 Green St., Suite 101  
Dover, Delaware 19904

Florida Marine Transporters, LLC  
Attn: Legal Department  
2360 5th St.  
Mandeville, Louisiana 70471

Goodrich Oil Company  
Scott C. Sinclair  
401 Edwards St., Suite 1901  
Shreveport, Louisiana 71101

Goodrich Oil Company  
C T Corporation System  
Registered Agent  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Heartland Barge Management, LLC  
Corporation Service Center  
Registered Agent  
2711 Centerville Rd, Suite 400  
Wilmington, Delaware 19808

Heartland Barge Management, LLC  
Attn: Legal Department  
1007 N. Main Street  
Columbia, Illinois 62236

Honeywell International  
Corporation Services Company  
Registered Agent  
501 Louisiana Ave.  
Baton Rouge, Louisiana 70802

Honeywell International  
115 Tabor Rd.  
Morris Plains, New Jersey 07950

International Paper Company  
CT Corporation System  
Registered Agent for International Paper Company  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

International Paper Company  
Attn: Legal Department  
6400 Poplar Ave  
Memphis, Tennessee 38197

Magnolia Marine Transport Company  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Magnolia Marine Transport Company  
Kathryn W Stone  
2829 Lakeland Dr.  
Jackson, Mississippi 39232

Marathon Oil Company  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Marathon Oil Company  
Attn: Legal Department  
1300 East 9th St  
Cleveland, Ohio 44114

Merichem Company  
The Corporation Trust Company  
Registered Agent  
Corporation Trust Center  
1209 Orange St  
Wilmington, Delaware 19801

Merichem Company  
Attn: Legal Department  
5455 Old Spanish Trail  
Houston, Texas 77023

Occidental International Corporation  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Occidental International Corporation  
Attn: Legal Department  
5 Greenway Plaza, Suite 110  
Houston, Texas 77046

Occidental Petroleum Corporation  
The Corporation Trust Company  
Registered Agent  
Corporation Trust Center 1209 Orange St  
Wilmington, Delaware 19801

Occidental Petroleum Corporation  
Attn: Legal Department  
1747 Pennsylvania Ave N.W.  
Washington, District Of Columbia 20006

Olin Corporation  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Olin Corporation  
Attn: Legal Department  
190 Carondelet Plaza, Suite 1530  
Clayton, Missouri 63105

PPG Industries, Inc.  
The Prentice-Hall Corporation System, Inc.  
Registered Agent for PPG Industries, Inc.  
501 Louisiana Avenue  
Baton Rouge, Louisiana 70802

PPG Industries, Inc.  
Attn: Legal Department  
One PPG Place  
Pittsburgh, Pennsylvania 15272

Axiall Corporation  
The Corporation Trust Company  
Registered Agent  
Corporation Trust Center  
1209 Orange Street  
Wilmington, Delaware 19801

Axiall Corporation  
Attn: Legal Department  
1000 Abernathy Road NE, Suite 1200  
Atlanta, Georgia 30328

John W. Stone Oil Distributor, L.L.C.  
Thomas Willis, Jr.  
Registered Agent  
1601 Bell Chase Hwy, Suite 300  
Terrytown, Louisiana 70056

John W. Stone Oil Distributor, L.L.C.  
Attn: Legal Department  
1601 Bell Chase Hwy, Suite 300  
Gretna, Louisiana 70056

Seariver Maritime Financial Holdings, Inc.  
Corporation Service Company  
Registered Agent for Seariver Maritime Financial  
Holdings, Inc.  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Seariver Maritime Financial Holdings, Inc.  
Attn: Legal Department  
22777 Springwoods Village Parkway  
Spring, Texas 77389

Sabine Ship Services, Inc.  
Alston E. Bourne  
2975 Gulf States Road  
Beaumont, Texas 77701

Sabine Ship Services, Inc.  
Attn: Legal Department  
2975 Gulf States Road  
Beaumont, Texas 77701

Stapp Barge Inc.  
Bruce B. Stapp  
5315 Dickinson Ave  
Dickinson, Texas 77539

Tesoro Corporation  
Corporation Service Company  
Registered Agent  
2711 Centerville Road, Suite 400  
Wilmington, Delaware 19808

Tesoro Corporation  
Attn: Legal Department  
19100 Ridgewood Parkway  
San Antonio, Texas 78259

Texaco Inc.  
Registered Agent  
The Prentice-Hall Corporation System, Inc.  
2711 Centerville Rd, Suite 400  
Wilmington, Delaware 19808

Texaco Inc.  
Attn: Legal Department  
6001 Bollinger Canyon Rd  
San Ramon, California 94583

Union Carbide Corporation  
CT Corporation System  
Registered Agent  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

Union Carbide Corporation  
Attn: Legal Department  
1254 Enclave Pkwy  
Houston, Texas 77077

Chesson Oil Company, Inc.  
Lilton Chesson, Jr.  
Randall Chesson  
Registered Agents  
328 Pujo Street, 10th Floor  
Lake Charles, Louisiana 70602

Hess Corporation  
C T Corporation System  
Registered Agent  
3867 Plaza Tower Drive  
Baton Rouge, Louisiana 70816

Hess Corporation  
Hess Corporation Corporate Headquarters  
Attn: Legal Department  
1185 Avenue of the Americas, 40th Floor  
New York, New York 10036

James Moon Marine Associates, Inc.  
James Moon  
Registered Agent  
15107 Coral Oak Court  
Houston, Texas 77059

James Moon Marine Associates, Inc.  
8806 Orchard Lane  
La Porte, Texas 77571-7612

Marine Vacuum Service, Inc.  
Charles Campbell, President  
1516 S Graham Street  
P.O. Box 24263  
Seattle, Washington 98124

Marine Vacuum Service, Inc.  
Harold A. Thoreen  
Registered Agent  
Fishermen's Term Nordby Bldg.  
1715 W Nickerson Street  
Seattle, Washington 98119